

## EXHIBIT A

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51          **UNITED STATES DISTRICT COURT**  
 52          **NORTHERN DISTRICT OF CALIFORNIA**

53          ANIBAL RODRIGUEZ, JULIEANNA  
 54          MUNIZ, ELIZA CAMBAY, SAL  
 55          CATALDO, EMIR GOENAGA, JULIAN  
 56          SANTIAGO, HAROLD NYANJOM,  
 57          KELLIE NYANJOM, and SUSAN LYNN  
 58          HARVEY, individually and on behalf of all  
 59          others similarly situated,

60          Plaintiffs,

61          vs.

62          GOOGLE LLC,

63          Defendant.

64          Case No.: 3:20-cv-04688

65          **[PLAINTIFFS' PROPOSED] ORDER**  
 66          **REGARDING CLAWBACK DISPUTE**

67          The Honorable Alex G. Tse  
 68          Courtroom A – 15th Floor  
 69          Trial Date: Not Yet Set

1 [PROPOSED] ORDER

2 Before the Court is the parties' Joint Letter Brief regarding the parties' dispute over a  
3 document that Google has clawed back as privileged. ("Clawback Joint Letter Brief"). Having  
4 considered the Clawback Joint Letter Brief, reviewed the document *in camera*, and good cause  
5 having been shown, the Court orders as follows:

6 The document is not privileged. Google shall produce to Plaintiffs an unredacted version  
7 of the document within one day of this Order. Within one week of this Order, Google shall also  
8 produce any other "Privacy Design Documents" that are responsive to Plaintiffs' Requests for  
9 Production.

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11 **IT IS SO ORDERED.**

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13 DATED: \_\_\_\_\_

14 Honorable Alex G. Tse  
15 United States Magistrate Judge

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